

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the matter of	)	
	)	ET Docket 01-278
Review of Part 15 and other Parts of the	)	RM-9375
Commission's Rules	)	RM-10051
	)	

**REPLY COMMENTS OF**  
**RETLIF TESTING LABORATORIES**

Retlif Testing Laboratories (Retlif), pursuant to Section 1.415 and 1.419 of the Commission's Rules, hereby submit these reply comments in response to the Notice of Proposed Rulemaking (NPRM) in the above captioned proceeding.

Retlif was founded in 1978 to provide EMC compliance testing to FCC Parts 15 and 18. Since that time, our capabilities have expanded to include environmental testing, acoustic noise, and powerline simulation, as well as others, in a variety of industries: telecommunications, information technology, military/commercial aerospace, and others.

Since its founding, Retlif has been a leading force in the drive for accreditations, approvals and certifications. In fact in EMC testing, Retlif pioneered industry efforts that resulted in the creation of the NVLAP program. Retlif holds accreditations, approvals and certifications worldwide to meet the demands of its multinational customers.

Given its experience with FCC technical requirements and accreditation issues, Retlif opposes the Commission's proposal to remove the requirement from Section 2.948 from its rules that require laboratories to submit test data for equipment subject to certification under Parts 15 and 18 to file an up-to-date description of its facilities with the Commission. By removing this requirement for accredited laboratories only and shifting it to the accrediting bodies, the Commission is adding costs to the accredited laboratory since it must now pay for an accreditation body to file this information with the Commission. This will severely impact small and medium-sized laboratories which comprise the majority of FCC-listed laboratories.

The proposed change by itself might be acceptable. However, combined with the change in criteria (to the new ANSI C63.4-2000 measurement procedure) for determining the technical acceptance of a site, there will be no consistent application of the new standard for many years since there was wide interpretation of the standard within the C63 committee that ultimately approved it. Therefore, Retlif opposes the Commission's proposal to change the current measurement standard.

In the alternative, Retlif proposes that the Commission hold both proposals in abeyance until a series of meetings can be held among the Commission, accreditors and laboratories to (1) establish clear and defined guidelines on how the new measurement standard will be applied, and (2) to establish a reasonable

timeframe in which the new measurement standard can be implemented. Retlif is prepared to assist in this effort individually and through its memberships in a variety of affected associations, such as the American Council of Independent Laboratories (ACIL) and the Telecommunications Industry Association (TIA).

Respectfully submitted,

RETLIF TESTING LABORATORIES  
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